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D. Billye Sanders
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March 20, 1998

Via Hand-Delivery

K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: BellSouth Telecommunications, Inc.'s Entry Into Long Distance ("InterLATA") Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996; Docket No. 97-00309 - Response of TCG MidSouth, Inc. to First Discovery Requests of the Consumer Advocate

Dear Mr. Waddell:

Enclosed you will find the original and thirteen (13) copies of TCG MidSouth, Inc.'s Response to the Consumer Advocate's First Discovery Requests of TCG MidSouth, Inc. The response to question number 1 contains **CONFIDENTIAL INFORMATION** and it should be handled in accordance with the Protective Order dated February 25, 1998 which was issued in this docket.

Sincerely,



D. Billye Sanders

DBS:lmb
w/Enclosures

cc: Parties of Record (who have signed the Protective Order)

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

REC'D TN
REGULATORY AUTH.

'98 MAR 20 PM 12 25

IN RE: BellSouth Telecommunications, Inc.'s)
Entry Into Long Distance (InterLATA))
Service in Tennessee Pursuant to Section 271)
of the Telecommunications Act of 1996)

Docket No. 97-00309

OFFICE OF THE
EXECUTIVE SECRETARY

TELEPORT COMMUNICATION GROUP INC.'S RESPONSES TO THE CONSUMER
ADVOCATE DIVISION'S DISCOVERY REQUESTS - SET II

1. For each service area in Tennessee identify:
 - (a.) the number of residential customers served by the company's own facilities.
 - (b.) the number of residential customers served by resale of BellSouth service.
 - (c.) the number of residential customers service by use of BellSouth unbundled network
 - (d.) the number of business customers served by the company's own facilities.
 - (e.) the number of business customers served by resale of BellSouth service.
 - (f.) the number of business customers service by use of BellSouth unbundled network elements.

2. Provide any analysis in TCG-MidSouth, Inc.'s possession of time laps between the TCG-MidSouth, Inc.'s submission of orders to BellSouth Telecommunications, Inc. and the time that TCG-MidSouth, Inc. was notified of errors in such orders. If data is available, identify the time laps for orders involving TCG-MidSouth, Inc.'s provision of service by:

- i. TCG-MidSouth, Inc.'s use of BellSouth's unbundled network elements,
- ii. use of TCG-MidSouth, Inc.'s own facilities, and
- iii. TCG-MidSouth, Inc.'s resale of BellSouth's service.

RESPONSE:

TCG is in the process of obtaining information responsive to this discovery request. TCG will provide this information as soon as it is available.

3. Provide copies of any analysis, reports, and/or correspondence provided to TCG-MidSouth, Inc. by BellSouth concerning the number and type of error made by TCG-MidSouth, Inc. employees that resulted in rejection of the TCG-MidSouth, Inc.'s orders.

RESPONSE:

TCG is in the process of obtaining information responsive to this discovery request. TCG will provide this information as soon as it is available.

4. In response to Item 11 of the Consumer Advocate Division's first discovery request BellSouth responded in part:

Once an order is pending in the Service Order Control System (SOCS), certain situations can arise that result in a "jeopardy" condition. A jeopardy occurs when it appears that the previously established due date for the order may not or will not be met. Jeopardy notifications, often called "jeopardies," therefore advise CLECs when an order is not expected to be completed by the due date. BellSouth currently notifies CLECs of service jeopardies primarily by telephone, and less frequently, by facsimile, which is substantially the same time and manner it does for itself.

- (a.) Does TCG-MidSouth, Inc. agree with BellSouth's response? If not, please explain. Please be specific and provide any available documentation to support your position.
- (b.) Provide copies of all analysis in TCG-MidSouth, Inc.'s possession concerning the number of or per cent of times BellSouth meets and the number of or per cent of times BellSouth fails to meet the initial established due date. If available provide the breakdown as following service categories.

- i. TCG-MidSouth, Inc.'s use of BellSouth's unbundled network elements,
- ii. use of TCG-MidSouth, Inc.'s own facilities, and
- iii. TCG-MidSouth, Inc.'s resale of BellSouth's service.

RESPONSE:

TCG is in the process of obtaining information responsive to this discovery request. TCG will provide this information as soon as it is available.

5. Provide all analysis in TCG-MidSouth, Inc.'s possession concerning the amount of time that TCG-MidSouth, Inc.'s customers are out of service during cut over from BellSouth, where service is being furnished by:
 - i. TCG-MidSouth, Inc.'s use of BellSouth's unbundled network elements,
 - ii. use of TCG-MidSouth, Inc.'s own facilities, and
 - iii. TCG-MidSouth, Inc.'s resale of BellSouth's service.

RESPONSE:

TCG is in the process of obtaining information responsive to this discovery request. TCG will provide this information as soon as it is available.

6. In response to the Consumer Advocate's First Discover Request Item 3, BellSouth responded:

See Response to Item 2. BellSouth reiterates that it has supplied information regarding submission of orders via the EDI interface in the Local Exchange Order (LEO) Guidelines. The current edition has been available to CLECs for at least 6 months, but the first edition was made available in April, 1997. The LEO Guide was attached to the Direct Testimony of Gloria Calhoun as Exhibit GC-26 and to the Affidavit of William Stacy as Exhibit WNS-45. While BellSouth had previously provided much of this information (most of it is contained in the LEO Guide), on January 30, 1998, a comprehensive package of edits (including the Local Exchange Ordering (LEO) and Local Exchange Service Order Generator (LESOG) edits and Rejects requirements, and a disk of the Service Order Edit Routine (SOER) edits used by the Service Order Control System (SOCS) was delivered to CLECs and notice of the availability of these edits was put on BellSouth's CLEC web site.

Regarding the subject of "flow-through," attached is the January flow-through report. This report shows the flow-through rate of all CLECs using LENS or EDI for electronic ordering for the month of January 1998. "Raw flow-through" includes orders rejected for errors, many of which are CLEC input errors.

"Adjusted flow-through" excluded rejected orders, and shows what the systems are capable of flowing through mechanically. Also attached are CLEC order errors analyses, showing the types of order errors observed during an examination of every electronic order placed for three days in November and September.

The January flow-through report shows that two CLECs, CLECs L and P, which placed 659 and 332 orders respectively electronically in January alone, achieved non-adjusted flow-through rates of 98.0% and 96.1%, showing that high flow-through with trained service representatives is indeed quite possible using the electronic interfaces BellSouth provides for CLECs. This report's results indicate that January's raw, non-adjusted flow-through rate was 63.3%, a 150% improvement over July's raw flow-through rate of 25%. When January's 63.6% raw flow-through is adjusted for the CLEC-caused order errors, which were 80.1%, the adjusted flow-through rate for January is 90.5%. This rate is comparable to the combined retail flow-through rates for residence and business orders.

The second set of documents attached in response to this Request reflect that BellSouth conducted analyses of order flow-through and error which caused orders to be rejected taking a sample of all electronic orders placed during 1 day in September and 2 days in November, to examine each order to determine which errors are indeed CLEC order errors and BellSouth's system errors. The report validates that CLECs' order error rates ranged from 27% to 88%, also indicating that lower error rates are indeed achievable. November's analysis of electronic order errors shows that SOER (errors used by SOCS) errors accounted for 45% of the CLECs' errors. These SOER errors include many omitted or incorrect USOCs on the service order. This is in spite of the fact that BellSouth has provided CLECs the required USOCs in the Local Exchange Ordering Guide, Volumes 2 and 3, which CLECs have had since April, 1997, and again in BellSouth's CLEC web site. Another error is improper formatting of data on the service order (no space after a comma, for example). As stated earlier, this information also was provided in the three-volume Local Exchange Ordering Guide. The second largest CLEC error category was address errors, which accounted for 26.7% of the CLEC errors.

BellSouth has provided CLECs the information they need to perform correct order processing, as demonstrated by the two CLECs mentioned earlier, who are achieving non-adjusted flow-through rates of 98% and 96%.

BellSouth also provide ongoing assistance to CLECs to help them decrease their order errors and rejects, and therefore increase their order flow-through. BellSouth continues to conduct regularly scheduled training classes on the Electronic Interfaces - BellSouth trained 383 CLEC attendees in 1997's Electronic Interfaces classes. In addition to the documentation previously listed, BellSouth has provided the LENS User Guide, the Trouble Analysis Facilitation Interface (TAFI) User Guide, the EDI-PC Harbinger Training Manual, as well as specifications for CGI-LENS and TAFI. BellSouth also provides a team of people who can provide on-site assistance to CLECs upon request (at their locations), to help them with their use and understanding of the Electronic Interfaces. Finally, BellSouth has provided to the CLECs electronic access to USOCs, as well as the Rejects Requirements binder developed by BellSouth and agreed upon by the CLEC EDI users.

- (a.) Does TCG-MidSouth, Inc. agree with BellSouth's response? If not explain. Please be specific and provide supporting documentation.

RESPONSE:

TCG is in the process of obtaining information responsive to this discovery request. TCG will provide this information as soon as it is available.

7. In response to Consumer Advocate Division first discovery request Item 6(First), BellSouth responded:

The CLECs have requested that notification of rejected orders be delivered to them via EDI, and BellSouth began implementing electronic notification in November 1997, as described below. There currently are no industry standards for providing electronic reject or error notification. BellSouth's current EDI implementation complies with the national standards established by the industry's Ordering and Billing Forum in TCIF version 6.0. However, neither this version--nor version 7.0, which is scheduled to be implemented on March 16, 1998 -- provides standards for returning information to the CLEC for orders rejected because of errors detected by LEO, LESOG, or SOCS. Despite the lack of industry standards, BellSouth has already developed and

implemented the first of a two-stage process to provide error rejection electronically. This mechanism returns an error code and an explanation of the error to CLECs using the EDI interface. This initial stage of this automated reject capability , which was tested by MCI, became operational in November 1997. This stage contains 68 percent of the total electronic rejects to be implemented. The remaining error types are being addressed in the second phase of this implementation. To facilitate this development in the absence of industry standards, BellSouth hosted a conference on October 30 and 31, 1997 for all CLECs using EDI. This conference was necessary because of the nature of EDI, which requires complementary programming on both BellSouth's and the CLECs' side of the EDI interface. The CLECs and BellSouth agreed on the specifications required for the remaining capability which all parties would implement on their respective sides of the EDI interface. The second phase of the eject capability is currently schedule to be operational on March 16, 1998. Until the second phase is implemented, rejects not included in the 68 percent of error types currently handled by EDI are routed to the Local Carrier Service Center, where they can be corrected by the LCSC or faxed to the CLECs if necessary. . . .

- (a.) Has TCG-MidSouth, Inc. agreed to the specifications required for the remaining capability will implement on their respective sides of the EDI interface.
- (b.) Has TCG-MidSouth, Inc. tested the initial stage?
- (c.) If TCG-MidSouth, Inc. is using this initial stage, give the date that TCG-MidSouth, Inc.'s use began.
- (d.) If TCG-MidSouth, Inc. is not using the initial stage, please explain.
- (e.) Does TCG-MidSouth, Inc. plan to begin using the final stage on March 16, 1998? If not please explain.
- (f.) Please identify any statements made by BellSouth in this response with which TCG-MidSouth, Inc. disagrees.

RESPONSE:

TCG is in the process of obtaining information responsive to this discovery request. TCG will provide this information as soon as it is available.

- 8. In response to Item 7 of the Consumer Advocate Division's first discovery request BellSouth stated:

(a) BellSouth object to this request as phrased. BellSouth does not believe there are any deficiencies. Subject to this objection, BellSouth has and does provide CLECs with mechanized firm order confirmations (FOCs), but it **does not** have a corresponding process for its own retail operations. An FOC is the CLEC's assurance that its order has successfully passed through the various edits and formatting checks in LEO, LESOG, and SOCs, and that the order is pending in SOCS. A completion notice (CN) is provided to a CLEC after a service order has been posted as "complete" in SOCS. BellSouth **does not** have a corresponding process for itself. For information regarding rejection and jeopardy notification, please see BellSouth's response to Data Request nos. 5,6 (First), 10, and 11. Also see BellSouth's response to nos. 8, 9, 12, and 13. (Emphasis provided.)

- (a.) Does TCG-MidSouth, Inc. agree with BellSouth's response? If not, please explain. Please be specific and provide as supporting documentation.

RESPONSE:

TCG is in the process of obtaining information responsive to this discovery request. TCG will provide this information as soon as it is available.

9. In response to Item 15 of the Consumer Advocate Division's first discovery request BellSouth stated:

In response to Item no. 14, BellSouth admitted that it does not integrate the LENS pre-ordering and the EDI ordering interfaces for CLECs. Integration of the pre-ordering interfaces is the responsibility of each CLEC, if it desires integration; it is not BellSouth's responsibility. However, since the time of the Louisiana filing, and updated GCI specification for LENS has been made available to interested CLECs. The EC-LITE machine-to-machine pre-ordering interface, which may also be integrated with EDI, became available on December 31, 1997.

- (a.) Does TCG-MidSouth, Inc. agree with this response? If not, please explain. Please be specific and provide supporting documentation.
- (b.) Has TCG-MidSouth, Inc. integration of its pre-ordering interfaces? If not, please explain.

RESPONSE:

TCG is in the process of obtaining information responsive to this discovery request. TCG will provide this information as soon as it is available.

10. Provide any analysis of the length of time between being notified by BellSouth that it will not be able to accomplish the cut over and the scheduled cut over date.

RESPONSE:

TCG is in the process of obtaining information responsive to this discovery request. TCG will provide this information as soon as it is available.

11. Provide any analysis that shows the number of times/ frequency of customers service being disconnected by BellSouth and you not being able to provide service to the customer due to BellSouth's problems. (Provide supporting documentation.)

RESPONSE:

TCG is in the process of obtaining information responsive to this discovery request. TCG will provide this information as soon as it is available.

The foregoing responses were provided on behalf of TCG by:

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